



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
KALAMAZOO DISTRICT OFFICE



C. HEIDI GREYHER
DIRECTOR

February 23, 2017

Mr. Melvin Fox
West Michigan Flocking and Assembly
200 Lovejoy Road
South Haven, Michigan 49090

SRN: A6600, Van Buren County

Dear Mr. Fox:

VIOLATION NOTICE

On February 9, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of West Michigan Flocking and Assembly (Facility), located at 200 Lovejoy Road, South Haven, Michigan. The purpose of this inspection was to determine the Facility's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) No. 19-05.

During the inspection, staff of the AQD observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-FLOCKLINE2 & 3	Special Condition 2.1a and 3.1a of PTI No. 19-05	More than 2,000 pounds of VOC emitted from Flocklines 1-4 in a calendar month
EU-FLOCKLINE2 & 3	Special Condition 2.1b and 3.1b of PTI No. 19-05	More than 10 tons per year of VOC emitted from Flocklines 2 and 3 in a 12 month rolling time period
EU-FLOCKLINE1, 2, 3, & 4	Special Condition 1.6, 2.6, 3.6, and 4.6 of PTI No. 19-05	No Method 24 testing was completed on any adhesive, coating, or cleaning solvent
FGFLOCKING	Special Condition 5.3 of PTI No. 19-05	No Method 24 testing was completed on any adhesive, coating, or cleaning solvent
Commencement of construction	R 336.1201 (Rule 201)	Facility commenced construction of a new facility without first obtaining a PTI

During the inspection, the Facility's records indicated multiple exceedances of emission limits. Exceedances of the 2000 pounds of volatile organic compound (VOC) per calendar month were noted on EU-FLOCKLINE2 and 3. Exceedances of the 10 tons per year (tpy) of VOC on a 12 month rolling time period were also noted in EU-FLOCKLINES2 and 3. Exceedance values are listed below:

EU-FLOCKLINE2

2000 lbs VOC/calendar month

- January 2015 - 2,624.8 lbs of VOC (624.8 lbs over the emission limit)
- June 2015 - 3,012.3 lbs of VOC (1,012.3 lbs over the emission limit)
- August 2016 - 2,062.5 lbs of VOC (62.5 lbs over the emission limit)
- November 2016 - 4,145.0 lbs of VOC (2,145.0 lbs over the emission limit)

10 tpy of VOC/12 month rolling

- April 2015 - 10.14 tpy of VOC (0.14 tons over the emission limit)
- June 2015 - 10.35 tpy of VOC (0.35 tons over the emission limit)
- July 2015 - 10.34 tpy of VOC (0.34 tons over the emission limit)
- August 2015 - 10.12 tpy of VOC (0.12 tons over the emission limit)
- December 2016 - 10.66 tpy of VOC (0.66 tons over the emission limit)

EU-FLOCKLINE3

2000 lbs VOC/calendar month

- January 2015 - 2,755.5 lbs of VOC (755.5 lbs over the emission limit)
- November 2016 - 3,765.5 lbs of VOC (1,765.5 lbs over the emission limit)

10 tpy of VOC/12 month rolling

- April 2015 - 10.09 tpy of VOC (0.09 tons over the emission limit)

This is a violation of the emission limits specified in Special Condition 2.1a and 3.1a, as well as 2.1b and 3.1b of PTI No. 19-05.

The Facility was also unable to produce Method 24 testing data for the VOC content, water content; and density of any adhesive, coating, and/or cleaning solvent used at the Facility. This is a violation of the testing requirements specified in Special Condition 1.6, 2.6, 3.6, 4.6, and 5.3 of PTI No. 19-05. These conditions require Method 24 testing for EU-FLOCKLINE1, 2, 3, and 4, as well as FGFLOCKING.

During this inspection, it was noted that the Facility had commenced operation of an unpermitted process. The AQD staff advised the Facility on February 15, 2017, that this was a violation of Rule 201 of Act 451.

Mr. Melvin Fox
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A program for compliance may include a completed PTI application for the flocking process equipment. An application form is available by request, or at the following website: www.michigan.gov/deqair (in the shaded box on the upper right hand side of the page).

Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment that may be a source of an air contaminant.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by March 16, 2017 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If the Facility believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of the Facility. If you have any questions regarding the violations or the actions necessary to bring this Facility into compliance, please contact me at the telephone number listed below.

Sincerely,



Amanda Chapel
Environmental Quality Analyst
Air Quality Division
269-567-3551

AC:CF

Enclosure

cc: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Christopher Ethridge, DEQ
Mr. Thomas Hess, DEQ
Ms. Mary Douglas, DEQ